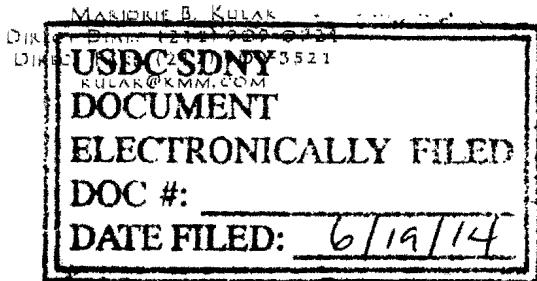




MEMO ENDORSED

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June 19, 2014

Rather than reschedule the conference, I would prefer that counsel execute a thirty-day order discontinuing the case without prejudice subject to reinstatement within thirty

VIA FACSIMILE (212) 805-6724

Hon. Frank Maas
United States District Court
Southern District of New York
500 Pearl Street, Room 740
New York, New York 10007

Re: Payano v. CompassRock Real Estate LLC, et al.; days upon
13-cv-7967 (DLC)(FM) letter request. The form that
KM&M File No. 11889.0015

Dear Judge Maas:

Counsel customarily use in my cases is
available on my webpage on the Court's

Our firm is counsel to Defendants CompassRock Real Estate LLC internet
("CompassRock") and Resource Management, Inc. ("RMI") in the referenced matter. site.

The parties are scheduled to appear before Your Honor on June 25, 2014 at 10:30 a.m. for a settlement conference in Courtroom 20A, 500 Pearl Street, New York, New York 10007. The parties have recently reached an agreement to settle this matter in principle, and will be negotiating a settlement agreement. In the interest of judicial economy, and to enable the parties to avoid the expense of preparing for and participating in the settlement conference, the parties respectfully request that the June 25 settlement conference be adjourned. I would, of course, schedule a
prompt settlement conference. Maas, if the
case does not allow for settlement conference on 6/19/14

Two proposed dates for rescheduling this settlement conference are July 30 and July 31, 2014. This is the first request for an adjournment of the settlement conference and plaintiff's counsel consents to this request. This request does not affect any other scheduled dates in this case.

Additionally, on May 29, 2014 and June 13, 2014, Defendants submitted requests to the Court for permission for Defendant RMI and the insurer, AIG, to appear for the June 25, 2014 settlement conference by telephone, because they do not have a knowledgeable representative within 100 miles of New York City who can participate in the conference in person. The Court granted the request for RMI to appear by telephone



Hon. Frank Maas
June 19, 2014
Page 2

on May 29, and the request for AIG to appear by telephone is pending before the Court. For the reasons set forth in the May 29 and June 13 requests, Defendants respectfully request that RMI and the representative from AIG be permitted to appear for the adjourned settlement conference by telephone. A representative for Defendant CompassRock will appear in person.

Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marjorie B. Kulak'.

Marjorie B. Kulak

cc: Abdul K. Hassan, Esq.